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BY ECF and Email

The Honorable Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Tony Clanton, 23-CR-328 (KAM)

Your Honor:

On August 25, 2023, the government served its initial production of discovery. ECF 30. The production was substantial and contained numerous items of surveillance footage from the alleged incidents. The government provided the production via a USB flash drive and undersigned prepared a copy for Mr. Clanton to review. Unfortunately, the sole laptop in his home was recently damaged and is now inoperable. Mr. Clanton requests a bond modification to permit him to view the discovery at a local library at the direction of Pretrial Services.

Mr. Clanton is currently not working and subject to home incarceration, and does not have sufficient funds to replace the laptop. Pretrial Services has no objection to this request. The government opposes this request. The discovery is not subject to a protective order. Mr. Clanton has a right to review his discovery, and permitting him to review the substantial discovery in this case at a location near his home without substantial cost is a reasonable modification to ensure that he can meaningfully participate in his defense. *See U.S. Const. amend VI; Fed. R. Crim. P. 16; Brady v. Maryland*, 373 U.S. 83 (1963); ECF 28 (Rule 5 Order).

Respectfully submitted,

/s Karume James
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cc: AUSA Andrew Roddin (by ECF and email)
Chambers of the Hon. Kiyo A. Matsumoto (by email)